



# CPMA

201-16298

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**COLOR PIGMENTS MANUFACTURERS ASSOCIATION, INC.**

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June 9, 2006

Mr. Steven Johnson  
Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, Virginia 22116

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**Re: Voluntary High Production Volume  
Test Program Test Plans**

Dear Mr. Johnson:

I am writing on behalf of the Color Pigments Manufacturers Association, Inc. ("CPMA") regarding our participation in the High Production Volume ("HPV") voluntary chemical testing program.

The CPMA is an industry trade association representing color pigment companies in Canada, Mexico, and the United States. CPMA represents small, medium, and large color pigments manufacturers throughout Canada, Mexico and the United States, accounting for 95% of the production of color pigments in North America. Color pigments are widely used in product compositions of all kinds, including paints, inks, plastics, glass, synthetic fibers, ceramics, colored cement products, textiles, cosmetics, and artists' colors. Color pigment manufacturers located in other countries with sales in Canada, Mexico, and the United States and suppliers of intermediates, other chemicals and other products used by North American manufacturers of color pigments are also members of the Association.

In our letter of February 3, 2006 to Mr. Charles Auer, we reviewed the specific pigments and intermediates that CPMA had previously agreed to represent, with reservations, in the HPV program. As indicated in our earlier letters, CPMA reserved the right to defer the review of any chemical under the HPV where that chemical or analog has been the subject of another commitment to either the EPA HPV program or other similar international programs.

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CPMA further reserved the right to withdraw from this commitment should the HPV program, when and if finalized, proved to be different from that understood, from time to time, by CPMA. Since all of the pigments and intermediates represented by CPMA have been used in international commerce for many years, there is extensive data available from a variety of published and unpublished sources.

Considerable information developed in the international Organization for Economic Cooperation and Development ("OECD") HPV testing program involving analog substances has been identified and incorporated in the enclosed test plans. Sufficient information has been identified and incorporated in the enclosed to allow for completion of the Environmental Protection Agency voluntary HPV program for these pigments and intermediates without further redundant and unnecessary testing.

The collection and assessment of available information has required considerable time. In many cases, we have waited until relevant data for analog compounds was complete in order to ensure that the necessary data could be cited in our test plan.

Enclosed are six test plans prepared by committees of the CPMA under the HPV Program. Test plans enclosed are:

"Test Plan for C.I. Pigment Red 48 (Calcium)(CAS NO.: 7023612), C.I. Pigment Red 48 (Barium)(CAS NO.: 7585413, C.I. Pigment Red 52 (Calcium)(CAS NO.: 17852992)"prepared by Color Pigments Manufacturers, Inc., Monoazo and Related Pigments Committee.

"Test Plan for 6-Amino-4-chloro-m-toluenesulfonic acid (2BAcid)(CAS NO.: 88-51-7) and 2-Amino-5-chloro-p-toluenesulfonic acid (C Amine) (CAS NO.: 88-53-9)" prepared by the Color Pigments Manufacturers, Inc., Monoazo Intermediates Task Force.

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"Test Plan for C.I. Pigment Violet 19 (CAS NO.: 1047-16-1), C.I. Pigment Red 122 (CAS NO. 890-26-7) and Dihydro Quinacridone (CAS No. 5862-38-4)" prepared by Color Pigments Manufacturers, Inc., Quinacridone Committee.

"Test Plan for C.I. Pigment Red 49 (Barium) (CAS NO.:1103-4)" prepared by Color Pigments Manufacturers, Inc., Monoazo and Related Pigments Committee.

"Test Plan for 3,3' Dichlorobenzidine (Dihydrochloride) (CAS NO.: 612-83-9)" prepared by Color Pigments Manufacturers, Inc., Dichlorobenzidine Task Force.

"Test Plan for C.I. Pigment Yellow 14 (CAS NO.: 5468-75-7)" prepared by Color Pigments Manufacturers, Inc., Diarylide Pigments Committee.

All questions should be addressed to me at:

Color Pigments Manufacturers  
Association, Inc.  
300 North Washington Street  
P.O. Box 20839  
Alexandria, Virginia 22320-1839  
  
Telephone: 703-684-4044  
Facsimile: 703-684-1795  
Attn: J. Lawrence Robinson, President

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Thank you for your attention. Please call if there are any questions or comments.

Sincerely,

J. Lawrence Robinson  
President

Enclosures